

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEROME CAMPBELL, on behalf of itself and :
all others similarly situated, :

Plaintiff, :

v. :

IROBOT CORPORATION, COLIN M. :
ANGLE, and ALISON DEAN, :

Defendants. :
----- x

19 Civ. 10373 (UA)

USDC SDNY
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DATE FILED: 12/5/19

**STIPULATION AND ~~PROPOSED~~ ORDER TO
TRANSFER VENUE TO THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS PURSUANT TO 28 U.S.C. § 1404(A)**

Plaintiff Jerome Campbell and Defendants iRobot Corporation, Colin M. Angle and Alison Dean, (collectively, "Defendants," and together with Plaintiff, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, on November 7, 2019, Plaintiff filed the above-captioned securities fraud class action asserting claims under Section 10(b) and 20(a) of the Securities Exchange Act of 1934, 15 U.S.C. § 78j(b) and 78t(a), and Rule 10b-5 promulgated thereunder (the "Complaint;" ECF No. 1);

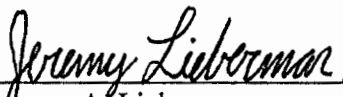
WHEREAS the Parties have conferred and agree that this case should be transferred to the District of Massachusetts for at least the following reasons:

1. The individual Defendants reside and/or work in Massachusetts, and iRobot Corporation is a Delaware corporation with its corporate headquarters in Bedford, Massachusetts;

2. the above-captioned action might have been brought in the District of Massachusetts under 28 U.S.C. § 1391(b)(1); and
3. the Parties agree that transferring this case to the District of Massachusetts is in the interest of the convenience of Parties and witnesses, likely most of whom are located in Massachusetts. Moreover, transfer to the District of Massachusetts is consistent with the efficient use of judicial resources, as the District of Massachusetts has a lower caseload per judgeship than the Southern District of New York (as of March 31, 2019, the Southern District of New York had a caseload of approximately 680 cases per judgeship, while the District of Massachusetts had a caseload of approximately 400 cases per judgeship). *See* Federal Court Management Statistics -- Profiles (Mar. 31, 2019), *available at* https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0331.2019.pdf;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, and respectfully requested, by and among the undersigned counsel for the respective Parties, subject to approval of the Court, that pursuant to 28 U.S.C. § 1404, the above-captioned matter be transferred to the District of Massachusetts.

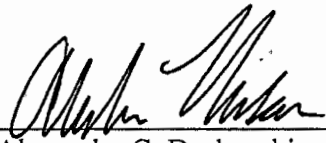
Dated: November 15, 2019
New York, New York

 *with permission*
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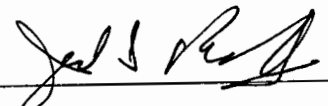

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IT IS SO ORDERED.

Dated: 12/4/, 2019


UNITED STATES DISTRICT JUDGE